

Gerald M. Needham, OSB #963746
Assistant Federal Public Defender
101 S.W. Main Street, Suite 1700
Portland, Oregon 97204
Tel: (503) 326-2123
Fax: (503) 326-5524
jerry_needham@fd.org

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIEL E. AGARD-BERRYHILL,

Defendant.

Case No. 3:20-cr-00352-IM

**UNOPPOSED MOTION TO
CONTINUE TRIAL DATE**

NOW COMES Gabriel E. Agard-Berryhill, through his attorney, Gerald M. Needham, and moves to continue the presently scheduled trial date of April 20, 2021, to June 29, 2021, or a date thereafter convenient to the Court. The reasons for the continuance are more fully amplified in the accompanying Declaration of Counsel. This motion is unopposed by the government.

Mr. Agard-Berryhill has been charged with one count of Arson in violation of 18 U.S.C. § 844(f)(1). He has been released on pretrial conditions. Counsel has spoken with Mr. Agard-Berryhill regarding the need for the continuance. He specifically authorized counsel to represent

he consents to the continuance with the knowledge that the timeframe is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

Assistant United States Attorney Natalie Wight has authorized counsel to represent the government has no objection to the requested continuance.

Based on the aforementioned and the accompanying Declaration of Counsel, counsel moves to continue the trial of April 20, 2021, to June 29, 2021, or a date thereafter convenient to the Court. The timeframe of the requested continuance is excludable from Speedy Trial computations pursuant to 18 U.S.C. § 3161(h)(7)(A), as additional time is required for pretrial investigation and trial preparation and the ends of justice served by the granting of the continuance outweigh the interests of the public and the defendant in a speedier trial.

Respectfully submitted on March 29, 2021.

/s/ Gerald M. Needham

Gerald M. Needham

Assistant Federal Public Defender